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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,

Defendants.

) Case No. 18-CR-577 CRB

) **STIPULATION AND [PROPOSED] ORDER**
) **REGARDING THE PENDING MOTION**
) **FOR A BILL OF PARTICULARS**

STIPULATION

The United States and the defendant, Stephen Chamberlain, through undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on November 1, 2021, the defendant Stephen Chamberlain made a pretrial Motion for a Bill of Particulars (Document 85).

WHEREAS, on December 1, 2021, the Court heard arguments on the pretrial motion and deferred and did not rule on the defendant's Motion for a Bill of Particulars.

WHEREAS, since December 1, 2021, the parties have conferred in good faith about the pending Motion for a Bill of Particulars. The defendant has agreed to withdraw the motion as it pertains to

Counts One through Sixteen, but not Count Seventeen. The government has agreed not to oppose a motion for a bill of particulars as to Count Seventeen. The parties have exchanged drafts of proposed bills of particular and have conferred on multiple occasions. In this way, the parties have substantially narrowed the issues before the Court.

WHEREAS the parties have not, however, agreed on a final form of the proposed bill of particulars. The government has offered to file the draft bill of particulars relating to Count Seventeen attached hereto as Exhibit A. The defendant objects, however, to the draft bill of particulars attached as Exhibit A and would like to have his objections heard by the Court.

WHEREAS the parties therefore request a supplemental briefing schedule before the next hearing before the Court.

WHEREAS the parties jointly request the following supplemental briefing schedule: the defendant will file a brief (not to exceed five pages) interposing any objections to the draft bill of particulars on May 13, 2022; and the government will file a brief in response (not to exceed five pages) on May 18, 2022; and the Court will adjourn its hearing on the motion for a bill of particulars to June 3, 2022, at 10:00 am.

IT IS SO STIPULATED.

DATED: May 4, 2022

STEPHANIE M. HINDS
United States Attorney

/s/ Adam A. Reeves

ROBERT S. LEACH
ADAM A. REEVES
Assistant United States Attorneys

DATED: May 4, 2022

BIRD, MARELLA, BOXER, WOLPERT,
NESSIM, DROOKS, LINCENBERG, & RHOW,
P.C.

/s/ Gary S. Lincenberg

GARY S. LINCENBERG
Counsel for Defendant Stephen Chamberlain

[PROPOSED] ORDER

FOR GOOD CAUSE SHOWN, the Court orders the following supplemental briefing schedule: the defendant will file a brief (not to exceed five pages) interposing any objections to the draft bill of particulars on May 13, 2022; and the government will file a brief in response (not to exceed five pages) on May 18, 2022; and the Court hereby adjourns its hearing on the Motion for a Bill of Particulars to June 3, 2022, at 10:00 am.

IT IS SO ORDERED.

DATED:

THE HONORABLE CHARLES R. BREYER
United States District Judge